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Attorneys for Defendant BLACKBERRY
CORPORATION

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

NEELAM SANDHU, an individual,

Plaintiff,

vs.

BLACKBERRY CORPORATION; a
Delaware Corporation,

Defendant.

Case No.: 3:24-cv-02002

**FIFTH JOINT CASE MANAGEMENT
CONFERENCE STATEMENT**

Date: January 12, 2025
Time 1:30 pm
Judge: Hon. Sallie Kim

Plaintiff Neelam Sandhu and Defendant BlackBerry Corporation hereby submit this fourth joint case management conference statement in advance of the January 12, 2025, case management conference.

Jurisdiction and Service: This case is based on diversity jurisdiction in which the substantive law of California applies. There are currently no issues regarding personal jurisdiction or venue. There are no parties remaining to be served.

Facts:

Plaintiff's Position: Plaintiff alleges BlackBerry discriminated against Plaintiff based on her gender, violating the Fair Employment and Housing Act and subsequently retaliated against her after reporting John Giamatteo's sexual and/or gender harassment. Plaintiff alleges BlackBerry's failure also violated FEHA because it failed to prevent harassment, retaliation, and discrimination. Plaintiff also alleged BlackBerry failed to properly pay her based on her gender and that Giamatteo harassed her based on her gender/sex, but the Court dismissed the claims on a motion to dismiss. Plaintiff still contends Defendants' conduct was illegal and resulted in her wrongful termination in violation of public policy.

Defendant's Position: Defendant strongly denies all of Plaintiff's allegations. Defendant's position is that BlackBerry did not engage in any alleged discrimination or retaliation, and that Giamatteo did not engage in harassment or retaliation. BlackBerry terminated Plaintiff as a result of a corporate restructuring, and not for any discriminatory or retaliatory reason.

Legal Issues: The Court granted-in-part a motion to dismiss. Defendant filed a summary-judgment motion, which is pending.

Motions: Defendant has filed a summary-judgment motion. Plaintiff is considering a motion to exclude an expert for failing to disclose information he relied upon. At this time, no other motions are contemplated (besides pre-trial motions in limine).

Amendment of Pleadings: At this time, no other amendments to the pleadings are contemplated.

Evidence Preservation: The parties are aware of their obligations to preserve potentially relevant evidence. They have also discussed this issue.

Disclosures: The parties have served initial disclosures.

Discovery: The parties have completed fact discovery and expert discovery.

Class Actions: This is not a class action.

Related Cases: There appear to be no cases that should be related to this one.

Relief: Plaintiff's economist expert has opined that Plaintiff lost \$1,004,196 in economic damages (which Defendant disputes). Plaintiff will also seek non-economic damages for

1 emotional harm, punitive damages, costs, and attorney's fees. It is up to the jury to select the
2 amount of emotional-harm and punitive damages (if any). Defendant's position is that Plaintiff
3 should take nothing.

4 **Settlement and ADR:** The parties attended mediation December 22, 2025, and did not
5 reach a resolution.

6 **Other References:** This case is not suitable for binding arbitration, a special master, or an
7 MDL panel.

8 **Narrowing of Issues:** Defendant filed a summary-judgment motion that, if not granted in
9 its entirety, might in the alternative narrow the scope of the case.

10 **Scheduling:** The Court has issued a scheduling order already. Currently, no party is
11 seeking an amendment to the case schedule.

12 **Trial:** The Court has ordered that trial shall begin on May 12, 2026 and last no longer
13 than seven days.

14 **Disclosure of Non-party Interested Entities or Persons:** The parties have filed the
15 required disclosure form.

16 **Professional Conduct:** The attorneys of record for the parties are familiar with the
17 applicable rules of professional conduct.

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20 Dated: January 5, 2026

GOMERMAN | BOURN & ASSOCIATES

21 By: /s/ Anthony Tartaglio

22 Maria Bourn
23 Anthony Tartaglio
24 Attorneys for Plaintiff
25 Neelam Sandhu
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1 Dated: January 5, 2026

MUNGER, TOLLES & OLSON LLP

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3 By: /s/ Katherine Forster
4 KATHERINE FORSTER
5 Attorneys for Defendant
6 BLACKBERRY CORPORATION
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10 I, Anthony Tartaglio, hereby attest that before e-signing this document for Katherine
11 Forster, I obtained her consent to do so.

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13 Dated: January 5, 2026

14 By: /s/ Anthony Tartaglio
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